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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$40,000.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:21-MC-00044-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Karen  
18 DeGuzman ("claimant"), by and through their respective counsel, as follows:

19 1. On or about November 24, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the Federal Bureau of Investigation ("FBI") with respect to the Approximately \$40,000.00  
21 in U.S. Currency (hereafter "defendant currency"), which was seized on September 15, 2020.

22 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A)  
23 to all known interested parties. The time has expired for any person to file a claim to the defendant currency  
24 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant  
25 currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
That deadline was February 22, 2021.

4. By Stipulation and Order filed February 23, 2021, the parties stipulated to extend to March 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. By Stipulation and Order filed March 22, 2021, the parties stipulated to extend to April 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to May 21, 2021.

Dated: 04/21/21

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

Dated: 04/21/21

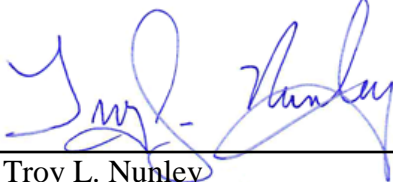
/s/ Justin L. Ward  
JUSTIN L. WARD  
Attorney for potential claimant  
Karen DeGuzman  
(Signature authorized by email)

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**IT IS SO ORDERED.**

Dated: April 22, 2001



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Troy L. Nunley  
United States District Judge